

Roberto J. Kampfner (SBN 179026)  
WHITE & CASE LLP  
633 West Fifth Street, Suite 1900  
Los Angeles, CA 90071  
Telephone: (213) 620-7700  
Facsimile: (213) 452-2329  
rkampfner@whitecase.com

*Attorneys for Plaintiff*

Leonard Grayver (SBN 211678)  
GREENBERG WHITCOMBE TAKEUCHI  
GIBSON GRAYVER, LLP  
21515 Hawthorne Boulevard, Suite 450  
Torrance, CA 90503  
Telephone: (310) 540-2000  
Facsimile: (310) 540-6609  
lgrayver@gwtllp.com

*Attorneys for Defendants*



**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

CHASSIN HOLDINGS CORPORATION, a  
British Virgin Islands business company,

Plaintiff,

v.

FORMULA VC FUND I GP, L.P., a Cayman  
Islands limited partnership; FORMULA VC  
LTD., a Cayman Islands exempted company;  
and RENATA AKHUNOVA, an individual,

Defendants.

Case No. 15-02294-MEJ

**STIPULATION REGARDING  
SERVICE OF COMPLAINT AND  
SUMMONS ON ALL DEFENDANTS  
AND COMMON DEADLINE FOR  
FILING A RESPONSIVE  
PLEADING; NOTICE OF  
WITHDRAWAL OF REQUEST FOR  
ENTRY OF DEFAULT AND  
MOTION FOR ALTERNATIVE  
SERVICE**

**RECITALS**

**WHEREAS** Plaintiff Chassin Holdings Corporation (“**Chassin**”) commenced the above captioned action (the “**Action**”) on May 21, 2015 by filing the *Complaint for Violation of SEC Rule 10b-5; Breach of Contract; Deceit; Fraud in the Sale of Securities; Breach of Fiduciary Duty; Violation of Cal. Bus. Prof. Code § 17200; and Ancillary Relief* [D.I. 1] (the “**Complaint**”); and

**WHEREAS**, on June 4, 2015, Chassin caused Defendants Formula VC Fund I GP, L.P. (“**Formula GP**”) and Formula VC Ltd. (“**Formula Ltd.**”) to be served, through their registered agent, with the Complaint, summons, and all other documents required to be served pursuant to all applicable federal and local rules (together, the “**Service Package**”); and

**WHEREAS**, between May 28 and June 7, 2015, a process server engaged by Chassin attempted service on Defendant Renata Akhunova at her last known addresses; and

**WHEREAS** on or about June 5, 2015, Chassin further caused the Service Package to be sent to Defendant Renata Akhunova at her last known email addresses; and

**WHEREAS**, on or about June 8, 2015, Chassin further sent a request for waiver of service of process to Defendant Renata Akhunova at her last known email addresses, which request for waiver of service of process was not returned; and

**WHEREAS** Defendant Renata Akhunova retained the undersigned Leonard Grayver for all purposes in the above captioned matter on or prior to June 10, 2015; and

**WHEREAS** Leonard Grayver contacted counsel to Chassin on June 10, 2015 and informed counsel to Chassin that he was engaged to represent only Defendant Renata Akhunova in the Action and was not authorized to accept service on Ms. Akhunova’s behalf; and

**WHEREAS** on July 16, 2015 Chassin filed its *Request to Enter Default Against Defendants Formula VC Fund I GP, L.P. and Formula VC Ltd.* [D.I. 13] (the “**Default Request**”) and *Plaintiff’s Motion for an Order Allowing Defendant Renata Akhunova to be Served (1) by Email, or (2) by Email and Publication* [D.I. 15] (the “**Service Motion**”); and

**WHEREAS** on July 16, 2015, Mr. Grayver contacted counsel to Chassin and informed

1 such counsel that Mr. Grayver had been retained by Defendants Formula LP and Formula Ltd.  
2 and requested that the deadline for such Defendants to file a responsive pleading, which passed  
3 on June 25, 2015, be fixed at a future date to permit such Defendants to respond; and

4 **WHEREAS** Mr. Grayver has since been authorized by Defendant Renata Akhunova to  
5 accept service on her behalf and, on July 20, 2015, did accept service of the Service Package on  
6 Ms. Akhunova via email; and

7 **NOW, THEREFORE**, in consideration of the foregoing premises, and intending to be  
8 legally bound hereby, the parties, through their duly authorized undersigned counsel, hereby  
9 stipulate and agree as follows:

10 **STIPULATION**

11 A. Each of the recitals set forth herein is true and correct.

12 B. The Defendants acknowledge that Formula GP, Formula Ltd., and Renata  
13 Akhunova have been properly served with the Service Package and waive any and all challenges  
14 to the sufficiency of such service; and

15 C. The date by which the Defendants must file a responsive pleading to the  
16 Complaint is hereby fixed as August 14, 2015; and

17 D. The Default Request and the Alternative Service Motion are hereby withdrawn by  
18 Chassin without prejudice.

1 DATED: July 20, 2015

WHITE & CASE LLP

2  
3 By: /s/ Roberto J. Kampfer

4 Roberto J. Kampfer  
Attorneys for Plaintiff

5 GREENBERG WHITCOMBE TAKEUCHI  
6 GIBSON GRAYVER, LLP

7 By: /s/ Leonard Grayver

8 Leonard Grayver  
9 Attorneys for Defendants

10  
11 Pursuant to Civil L.R. 5-1(i)(3), I, Roberto J. Kampfer, attest that Leonard Grayver authorized  
12 me to electronically sign his name and file the above Stipulation via email received at 6:40 p.m.  
13 PST on July 20, 2015.

14  
15 By: /s/ Roberto J. Kampfer

16 Roberto J. Kampfer  
Attorneys for the Plaintiff